

REMARKS

The following is intended as a full and complete response to the Office Action mailed on December 4, 2003. Claims 1-58 were examined. The Examiner rejected claims 1-2, 8-9, 32-33, 39-40 and 55-58 under 35 U.S.C. §102(e) as anticipated by Asente and claims 3-7, 10-31, 34-38 and 41-54 under 35 U.S.C. §103(a) as obvious in view of Asente in combination with Schuster. In addition to the foregoing, the Examiner objected to the Abstract for failing to comply with the maximum number of words requirements outlined in MPEP §608.01(b).

Rejections under 35 U.S.C. §102(e)

In the Office Action, the Examiner rejected claim 1 as being anticipated by the graphical pattern placement and adjustment technique taught by U.S. Patent No. 6,310,622 to Ascente. In response, Applicant is amending claim 1 and, as the rejection might be applied to the amended claim, respectfully traverses.

Claim 1 as amended recites the limitations of (i) selecting a grid type from a plurality of grid types, the grid type being associated with one or more grid attributes, and (ii) mapping a grid of the selected grid type onto a constraint. Contrary to the Examiner's suggestion, Ascente does not teach selecting a grid type or mapping a grid of the selected grid type onto a constraint. Rather, Asente teaches selecting or drawing a path, specifying spacing parameters for graphical elements along the path and determining placement points for the graphical elements along the path based on the spacing parameters. Nowhere does Asente teach the use of a grid, separate and distinct from the constraint, to determine where, across or within a constraint, objects or graphical elements are to be placed. At most, Asente teaches the use of one type of constraint (i.e., a path). But, as explained, Asente does not teach the use of a grid and therefore fails to teach each and

every one of the recited steps in amended claim 1. This failure precludes Asente from anticipating amended claim 1. For these reasons, Applicant submits that amended claim 1 is in condition for allowance and respectfully requests withdrawal of the §102(e) rejection of claim 1.

Similarly to amended claim 1, amended claims 32, 55 and 57 recite the limitations of selecting a grid type from a plurality of grid types and mapping a grid of the selected grid type onto a constraint. As explained with respect to claim 1, Ascente does not teach the selecting of a grid type or mapping a grid of the selected grid type onto the constraint and thus fails to teach all of the steps recited in, and does not anticipate any of, amended claims 32, 55 and 57. Applicants therefore respectfully request withdrawal of the §102(e) rejections of claims 32, 55 and 57 and request their allowance.

Claims 8-9 depend from allowable amended claim 1 and are allowable for at least the same reasons as amended claim 1. Likewise, claims 39-40 depend from allowable amended claim 32 and are allowable for at least the same reasons as amended claim 32. Applicant therefore respectfully requests withdrawal of the §102(e) rejections of claims 8, 9, 39 and 40 and allowance of those claims.

Similarly, claim 59 depends from allowable amended claim 1, claim 60 depends from allowable amended claim 32, claim 61 depends from allowable amended claim 55 and claim 61 depends from allowable amended claim 57. Claims 59-61 are thus allowable for at least the same reasons as amended claims 1, 32, 55 and 57. Applicant therefore respectfully requests withdrawal of the §102(e) rejection to the extent that this rejection might be applied to any of claims 59-61 and allowance of those claims.

Rejections under 35 U.S.C. §103(a)

The Examiner rejected claims 3-7 as being obvious in view of the graphical pattern placement and adjustment technique taught by Asente in combination with the graphical pattern placement technique taught by U.S. Patent No. 5,831,632 to Schuster. Applicant respectfully traverses because the cited references, either along or in combination, do not teach or suggest each and every element of any of claims 3-7.

Claims 3-7, as amended, depend from amended claim 1. As discussed above, amended claim 1 recites the limitations of selecting a grid type from a plurality of grid types and mapping a grid of the selected grid type onto a constraint. Again, Ascente does not teach the use of a grid, separate and distinct from the constraint, to determine where objects or graphical elements are to be placed across or within the constraint. Similarly, Schuster teaches no such use either. Rather, Schuster teaches selecting a pattern cell, selecting or drawing a path and placing the pattern cells along the path by dividing the path into corners and sides and then adjusting the pattern cell and/or path to fit an integral number of pattern cells along each side and modifying the shape of the pattern cell as needed to fit each corner of the path. Nowhere does Schuster teach the use of a grid to determine where, across or within a constraint, objects or graphical elements are to be placed. Specifically, and contrary to the Examiner's suggestion, a pattern cell is not the same as a grid. Schuster specifically defines a pattern cell as "a graphical pattern that is to be placed on an electronic document." (See Col. 4, line 67-Col. 5, line 1). Schuster is clear that a pattern cell is equivalent to the object, or the graphical element discussed in Ascente, that is placed along the path, not a grid. Since Schuster also fails to teach the use of a grid, these references, either alone or in combination, fail to teach or suggest all of the limitations recited in each of claims 3-7. This failure precludes Ascente and/or Schuster from rendering any of claims 3-7 obvious. For these

reasons, Applicant respectfully requests withdrawal of the §103(a) rejections of claims 3-7 and submits that these claims are in condition for allowance.

The Examiner also rejected claims 10-31, 34-38 and 41-54 as being obvious in view of Ascente in combination with Schuster. Similarly to claims 3-7, each of these claims, as originally submitted or amended, directly or indirectly depends from either allowable amended claim 1 or allowable amended claim 32 and are therefore allowable for the reasons set forth above. In this vein, Applicant respectfully requests withdrawal of the §103(a) rejections of claims 10-31, 34-38 and 41-54 and submits that these claims are in condition for allowance.

Objections to the Abstract

Applicant has submitted a new Abstract that is within the requisite word limit. Thus, Applicant submits that the new Abstract is in acceptable form. Accordingly, Applicant respectfully requests that the objections to the Abstract be withdrawn.

CONCLUSION

Based on the above remarks, Applicant believes that he has overcome all of the rejections and objections set forth in the Office Action mailed December 4, 2003 and that the pending claims are in condition for allowance. If the Examiner has any questions, please contact the Applicant's undersigned representative at the number provided below.

Respectfully submitted,

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